IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

| CLIFFORD FERRIN, |) |
|--------------------------------------|----------------------------------|
| Plaintiff, |)) |
| vs. |) Cause No. 05CV01923HEA 28 -86 |
| JANSSEN PHARMACEUTICA, L.P., et al., | JURY TRIAL DEMANDED |
| Defendants. | ONISOLIDATE ACTIONS Qual Oshid |
| MOTION TO CONSOLIDATE ACTIONS | |

Comes now Defendant Janssen, L.P., in consultation with counsel for Plaintiffs, and request that the following cases be consolidated before this Court for scheduling purposes, pre-trial purposes, and any pending motions to remand:

Agarwal v. Janssen Pharmaceutica, L.P., et al., 05-cv-1935 JCH

Alberty v. Janssen Pharmaceutica, L.P., et al., 06-cv-00415 CDP

Alford v. Janssen Pharmaceutica, L.P., et al., 05-cv-2026 CDP

Benson v. Janssen Pharmaceutica, L.P., et al., 05-cv-2016 SNL

Bledsoe v. Janssen Pharmaceutica, L.P., et al., 05-cv-2330 ERW

Cain v. Janssen Pharmaceutica, L.P., et al., 05-cv-2120 JCH

Crum v. Janssen Pharmaceutica, L.P., et al., 06-cv-0786 CEJ

Delvalle v. Janssen Pharmaceutica, L.P., et al., 06-cv-0205 SNL

Deruyter v. Janssen Pharmaceutica, L.P., et al., 05-cv-2155 CAS

Hanks v. Janssen Pharmaceutica, L.P., et al., 05-cv-2144 JCH

Harrington v. Janssen Pharmaceutica, L.P., et al., 05-cv-2158 ERW

Holden v. Janssen Pharmaceutica, L.P., et al., 05-cv-2121 SNL

Howard v. Janssen Pharmaceutica, L.P., et al., 05-cv-2122 CDP

Hunter v. Janssen Pharmaceutica, L.P., et al., 05-cv-2123 JCH

Hurst v. Janssen Pharmaceutica, L.P., et al., 05-cv-2181 CEJ

Johnson, Keith v. Janssen Pharmaceutica, L.P., et al., 06-cv-0204 CDP

Johnson, Michael v. Janssen Pharmaceutica, L.P., et al., 05-cv-2138 HEA

Jones v. Janssen Pharmaceutica, L.P., et al., 06-cv-0418 TCM

Journey v. Janssen Pharmaceutica, L.P., et al., 05-cv-1924 ERW

Lehar v. Janssen Pharmaceutica, L.P., et al., 05-cv-2182 JCH

Maldanado v. Janssen Pharmaceutica, L.P., et al., 06-cv-0260 CDP

Malone v. Janssen Pharmaceutica, L.P., et al., 05-cv-2183 CAS

Martin, Anastasia v. Janssen Pharmaceutica, L.P., et al., 05-cv-2150 DJS

McClane v. Janssen Pharmaceutica, L.P., et al., 06-cv-00236 DDN

Prince v. Janssen Pharmaceutica, L.P., et al., 05-cv-2086 CDP

Robinson v. Janssen Pharmaceutica, L.P., et al., 05-cv-2199 JCH

Sage v. Janssen Pharmaceutica, L.P., et al., 05-cv-2152 HEA

Saunders v. Janssen Pharmaceutica, L.P., et al., 05-cv-2154 SNL

Simmons v. Janssen Pharmaceutica, L.P., et al., 05-cv-2245 ERW

Smith v. Janssen Pharmaceutica, L.P., et al., 05-cv-2153 CEJ

Starkey v. Janssen Pharmaceutica, L.P., et al., 05-cv-2141 CDP

Stover y. Janssen Pharmaceutica, L.P., et al., 06-cv-0238 DDN

Treiber v. Janssen Pharmaceutica, L.P., et al., 05-cv-2292 CEJ

West v. Janssen Pharmaceutica, L.P., et al., 05-cv-2124 CDP

Consolidation of these proceedings will reduce the burden on the courts and the litigants. It will also promote judicial efficiency and consistency with respect to discovery and common pre-trial

issues, prior to co-defendants being severed where appropriate, and the cases being set for trials on an individual plaintiff basis.

WHEREFORE, Janssen hereby requests that the Court issue an Order consolidating these cases before the Honorable Henry E. Autrey, and that a scheduling conference be set thereafter to develop a coordinated plan for discovery and pre-trial matters.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing pleading was served via the Court's electronic filing system upon all counsel of record on June 23, 2006.

/s/ Jennifer S. Kingston